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UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
(San Francisco Division)

LOCAL 234 of the INTERNATIONAL
BROTHERHOOD OF ELECTRICAL
WORKERS, AFL-CIO; et al.,

Plaintiffs,

vs.

ADM ELECTRIC, INC., a California
Corporation; and, G. DEAN ALLEMAND, an
Individual,

Defendants.

Case No. C-07-4079 EMC

**REQUEST TO ENTER DEFAULT
AGAINST DEFENDANTS ADM
ELECTRIC, INC. and G. DEAN
ALLEMAND**

[F.R.C.P. Rule 55(a)]

TO: THE CLERK OF THE ABOVE-ENTITLED COURT

Plaintiffs LOCAL 234 of the INTERNATIONAL BROTHERHOOD OF ELECTRICAL
WORKERS, AFL-CIO; INTERNATIONAL BROTHERHOOD OF ELECTRICAL WORKERS'
UNION, LOCAL 234 EDUCATIONAL AND TRAINING FUND; ELECTRICAL WORKERS
HEALTH & WELFARE TRUST FUND; INTERNATIONAL BROTHERHOOD OF
ELECTRICAL WORKERS DISTRICT 9 PENSION PLAN; and, KEN SCHERPINSKI, as
Trustee of the Plaintiff Trusts and Business Manager/Financial Secretary of I.B.E.W. Local 234,
hereby request that the Clerk of the above-entitled Court enter default in this matter against

1 Defendant ADM ELECTRIC, INC., a California Corporation and Defendant G. DEAN
2 ALLEMAND, on the ground that said Defendants have failed to appear or otherwise respond to
3 the Summons and Complaint within the time prescribed by the Federal Rules of Civil Procedure.

4 Plaintiffs served the Summons and Complaint on Defendant ADM ELECTRIC, INC. on
5 September 1, 2007 as evidenced by the Proofs of Service of Summons and Complaint filed with
6 this Court. Plaintiffs also served the Summons and Complaint on Defendant G. DEAN
7 ALLEMAND on September 1, 2007 as evidenced by the Proofs of Service of Summons and
8 Complaint filed with this Court.
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10 The above-stated facts are set forth in the accompanying Declaration of Scott M. De Nardo,
11 filed herewith.

12 Respectfully Submitted,

13
14 Dated: 9/22/07

15 NEYHART, ANDERSON, FLYNN & GROSBOLL

16 By: 

17 SCOTT M. De NARDO
18 Attorneys for Plaintiffs
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PROOF OF SERVICE BY MAIL

I, the undersigned, declare:

I am employed in the City and County of San Francisco, State of California. I am over the age of 18 years and not a party to the within action; my business address is 44 Montgomery Street, Suite 2080, San Francisco, California 94104. On September ~~22~~ 23, 2007, I served the within:

REQUEST TO ENTER DEFAULT AGAINST DEFENDANTS ADM ELECTRIC, INC. and G. DEAN ALLEMAND

on the parties in said cause following our business practice, with which I am readily familiar. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service in a sealed envelope with postage fully prepaid. I placed a true copy of the within document enclosed in a sealed envelope with first class postage thereon fully prepaid for collection and deposit on the date shown below in the United States mail at San Francisco, California addressed as follows:

ADM ELECTRIC, INC.
2120 Santa Rosa Drive
Hollister, CA 95023

G. DEAN ALLEMAND
2120 Santa Rosa Drive
Hollister, CA 95023

I declare under the penalty of perjury that the foregoing is true and correct, and that this declaration was executed on September ~~22~~ 23, 2007, at San Francisco, California.



Scott M. De Nardo